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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street

San Francisco, Ca. 94105

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MEMORANDUM

SUBJECT: Ordot Landfill Site, Guam, Quality Assurance
Project Plan

FROM: Terry Stumph, Chief *Terry L Stumph*
Environmental Services Branch, OPM (P-3)

TO: Keith Takata, Chief
Superfund Programs Branch, TWMD (T-4)

The subject document was reviewed by Rose Fong, to assure that the concerns expressed by Laura Tom and Kent Kitchingman in the August 20, 1986 memorandum, were addressed adequately. The following relate to comments in that review which require further clarification.

1. Comments 1 and 4, Sampling/Analytical Scheme.

- a. The proposed sampling and analytical schedule, at least for the preliminary investigation, needs to be provided. Table 14-1, Summary of Water Sample Data Collection, is not clear in its presentation of groundwater and spring-water sampling.
- b. The intended uses of the data, (the correlation between the parameters selected and the objectives) must be stated. According to Section 5.0, enforcement is the general objective. However, not all of the measurements may be used in this way. For example, will the air sampling data derived from the field measurements for the purpose of site-safety planning also be used for enforcement?
- c. The air sampling scheme needs to be explained more fully, with respect to the rationale for selection of the analytes, the intended uses of the data (the Project Plan differs from the Sample Plan), the field measurements which are quantitative, and those which are qualitative. The methane studies need more description, some of which is furnished by the Sample Plan and should be reproduced in the Project Plan. Why is this compound of importance? How will it be quantitated? It does not appear in Table 9-2, Air Sampling Methods Selection Matrix. Which parameters will be measured by the HNU, by the Gastech Hydrocarbon Survey Meter, and by the OVA? How will odor analyses be conducted?

- d. In Table 4-1, data quality objectives need to be defined for all of the quantitative field measurements, such as the particulates.
2. Comments 5 and 6. Air Sampling Scheme.
 - a. Neither the Project Plan nor the Sample Plan addressed comment 6 of the June 25, 1986, Sample Plan review comments regarding the time of day during which air sampling will occur.
 - b. The source and preparation of the air sorbent tubes needs to be described as previously requested. The information in Table 14-2, Air Quality Sampling and Analysis, is not consistent with that in the Sample Plan, Section 6.6, Air Quality Monitoring, page VI-17.
 - c. Any changes in the analytical scheme which may result from review of the Sample Plan should also be incorporated into the Project Plan.
 - d. Section 9.1, General Laboratory Requirements, page 4. The preparation of glassware is according to CLP specifications.
 3. Comment 7. Documentation.
 - a. Section 7.2.2, Chain-of-Custody, page 4. Bullet 3 of the sub-section, Transfer of Custody and Shipment, must be corrected to agree with Section 7.2.5, Distribution of Copies.
 - b. Section 7.3, Field Notebooks, paragraph 2, sentence 1 is incomplete.
 4. Comment 11. Data Validation. The data validation criteria listed in Section 10.2, Data Validation, are not those used by EPA CLP. A reference which describes these criteria should be cited. On page 8 of this section, Item 13 is inappropriate to this project plan. In Section 10.2.1, Analytical Data, Region 9 data validation is performed using CLP criteria, or user-specified criteria in the case of SAS analyses. The Standard Operating Procedures for Evaluating Hazardous Waste Data should be added to the list of references.

5. Comment 12. Internal Quality Control.

A "complete set" of field blanks and duplicates appropriate to the air monitoring program needs to be defined. What frequency of duplication of one entire downwind station is planned? One travel blank must be included in each shipping container holding VOC samples. In Section 12.2.1, Water Level Measurement, it is stated that while a minimum of two measurements will be made, only one will be recorded. In order to be considered replicates, all measurements should be recorded.

The document is returned with these comments. If further information is needed, please contact Rose Fong at 4-8379.

Attachment

cc: G. Clifford
T. Mix